

**-FILED-**

APR 10 2024

Al Chanda J. Berta, Clerk  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

UNITED STATES OF AMERICA )

CAUSE NO. 2:24-CR-29-JTM  
JEM

v. )

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(1)(A)

CHALISE SHANTE GAINES )

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT 1**

On or about September 24, 2019, in the Northern District of Indiana,

**CHALISE SHANTE GAINES,**

defendant herein, in connection with the acquisition of a firearm from Westworth Sport Shop, a dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious statement to the dealer, which statement was intended and likely to deceive the dealer with respect to any fact material to the lawfulness of the sale of such firearm, in that the defendant represented on the Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record on that date, that

1) her current state of residence and address was 1649 Briarwood

Court, Lafayette, Indiana, whereas in truth and in fact, she knew that her current address was not 1649 Briarwood Court, Lafayette, Indiana; and

2) she was the actual purchaser of a firearm whereas in truth and in fact, she well knew she was purchasing said firearm for another person, all in violation of Title 18, United States Code, Section 922(a)(6).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 2**

On or about September 24, 2019, in the Northern District of Indiana,

**CHALISE SHANTE GAINES,**

defendant herein, knowingly made false statements and representations to the following firearms dealers, who are licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the dealer, in that she did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, on the following dates, to the effect that

- 1) her current state of residence and address was 1649 Briarwood Court, Lafayette, Indiana, Indiana, whereas in truth and in fact, she knew that her current address was not 1649 Briarwood Court, Lafayette, Indiana; and

2) she was the actual purchaser of a firearm whereas in truth and in fact, she well knew she was purchasing said firearm for another person, all in violation of Title 18, United States Code, Section 924(a)(1)(A).

A TRUE BILL:

s/ Grand Jury Foreperson  
Grand Jury Foreperson

CLIFFORD D. JOHNSON  
UNITED STATES ATTORNEY

By: s/ Caitlin M. Padula  
Caitlin M. Padula  
Assistant United States Attorney